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July 12, 2022

Via ECF

Honorable Eric N. Vitaliano
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Javier Aguilar, No. 20-cr-390 (ENV) (E.D.N.Y.)

Dear Judge Vitaliano:

We write to request that the Court further modify, in part, Defendant Javier Aguilar's pretrial release travel restrictions. *See* ECF Nos. 7, 35, 37. In connection with celebrations following the wedding of a close friend's son, Mr. Aguilar seeks the Court's one-time permission to travel to the District of Alaska from August 22–29, 2022, while subject to electronic monitoring. Because Mr. Aguilar can reach his destination (which is about 80 miles outside Anchorage) without passing through Canada, he does not request any temporary return of his passport. Mr. Aguilar will inform pretrial services of his precise travel plans, including in the event that he needs to take a connecting domestic flight toward his destination.

We have discussed this travel request with the prosecution, as well as with the U.S. Pretrial Services Offices for the Eastern District of New York and the Southern District of Texas. The prosecution and the U.S. Pretrial Services Office for the Eastern District of New York do not oppose Mr. Aguilar's request. The U.S. Pretrial Services Office for the Southern District of Texas will not oppose Mr. Aguilar's request if the Court grants it.

We thank the Court for its prompt attention to these issues.

Respectfully submitted,



Alex Spiro
Counsel for Defendant Javier Aguilar

cc: Counsel of Record (via ECF)

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